

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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*In the Matter of:*

Geuda Springs Post Office  
Geuda Springs, KS 67051  
(Paula Hills, Billilee A. Paton, Terry and  
Nancy Oursler, Linda Estrada, Patricia A.  
Blugaugh, Shannon Wendt, Liona Barbour  
and John Chapman, Petitioners)

Docket No. A2012-75

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**UNITED STATES POSTAL SERVICE COMMENTS REGARDING APPEAL**  
(January 10, 2012)

The Postal Regulatory Commission (the “Commission”) received eight letters of appeal, the earliest postmarked November 9, 2011, from postal customers Ms. Paula Hills, Ms. Billilee A. Paton, Mr. and Mrs. Terry and Nancy Oursler, Ms. Linda Estrada, Ms. Patricia A. Blugaugh, Ms. Shannon Wendt, Ms. Liona Barbour and Mr. John Chapman (collectively “Petitioners”) objecting to the discontinuance of the Post Office at Geuda Springs, Kansas (the “Geuda Springs Post Office”).<sup>1</sup> By means of Order No. 1019, dated December 2, 2011, the Commission docketed the letters, assigning PRC Docket No. A2012-75 as an appeal pursuant to 39 U.S.C. § 404(d). The administrative record was filed with the Commission on December 1, 2011. Ms. Billilee A. Paton and Ms. Shannon Wendt filed Participant Statements.

The letters and Participant Statements received by the Commission raise three issues: (1) the impact on the provision of postal services; (2) the impact on the community and (3) the calculation of economic savings expected to result from discontinuing the Geuda Springs Post Office. As reflected in the

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<sup>1</sup> This discontinuance was conducted pursuant to Handbook PO-101, dated August 2004, and updated with Postal Bulletin revisions through August 2, 2007.

administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,<sup>2</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Geuda Springs Post Office should be affirmed.

### **Background**

The Final Determination To Close the Geuda Springs, KS Post Office and Continue to Provide Service by Rural Route Service ("Final Determination" or "FD"),<sup>3</sup> as well as the administrative record, indicate that the Geuda Springs Post Office provided EAS-55 level service to 0 delivery route customers, 61 Post Office Box or general delivery customers, and retail customers from 9:00 a.m. to 12:15 p.m. and 1:00 p.m. to 4:15 p.m. Monday through Friday, and from 10:00 a.m. to 12:00 p.m. on Saturdays.<sup>4</sup> The Postmaster of the Geuda Springs Post Office retired on November 26, 2008.<sup>5</sup> Since the Postmaster vacancy arose, a non-career employee was installed as an officer-in-charge ("OIC") to operate the Geuda Springs Post Office. The employee serving as the OIC may be separated from the Postal Service, although attempts will be made to re-

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<sup>2</sup> See 39 U.S.C. 404(d)(2)(A).

<sup>3</sup> The Final Determination can be found at Item 47 in the administrative record. All citations to the Final Determination will be to "FD at \_\_," rather than to Item 47. The FD page number refers to the pages as marked on the upper right of the document. Other items in the administrative record are referred to as "Item \_\_."

<sup>4</sup> FD at 2; Item 18, Form 4920; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2

<sup>5</sup> *Id.*

assign her to an authorized position.<sup>6</sup> The average number of daily retail window transactions at the Geuda Springs Post Office is 12, accounting for 11 minutes of retail work. Revenue for the last three years was low: \$9,935 in FY 2008; \$12,126 in FY 2009; and \$10,629 in FY 2010.<sup>7</sup>

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route service administered through the Oxford Post Office,<sup>8</sup> an EAS-16 level office, located 11 miles away, which has 712 Post Office Boxes, of which 309 are unassigned.<sup>9</sup> Service will also be provided by cluster box units (CBUs) located in Geuda Springs.<sup>10</sup>

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the Geuda Springs Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to all Post Office Box customers of the Geuda Springs Post Office.<sup>11</sup> Questionnaires were also available over the counter for retail customers at the Geuda Springs Post

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<sup>6</sup> FD at 7; Item 15, Post Office Fact Sheet at 1; Item 33, Proposal at 8; Item 41, Proposal (Revised) at 8.

<sup>7</sup> FD at 7; Item 18, Form 4920; Item 33, Proposal at 8; Item 41, Proposal (Revised) at 8.

<sup>8</sup> The Oxford Post Office is not a candidate facility within the Retail Access Optimization Initiative (RAOI). See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1, at <http://www.prc.gov/prc-pages/library/detail.aspx?docketId=N2011-1&docketPart=Documents&docid=75971&docType=Library%20References&attrID=&attrName=>

<sup>9</sup> FD at 2; Item 18, Form 4920; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2. The Postal Service discovered in drafting these comments that the number of Post Office Boxes identified in Item 18, Form 4920, was incorrect, and the correct numbers have been substituted in these comments.

<sup>10</sup> FD at 2; Item 29, Proposal Checklist at 2; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2.

<sup>11</sup> Item 20, Questionnaire Instruction Letter.

Office.<sup>12</sup> A letter by Mike Monnington, Manager, Post Office Operations, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether operation of the Geuda Springs Post Office was warranted, and that effective and regular service could be provided through rural delivery and retail services available at the Oxford Post Office.<sup>13</sup> The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service that they were receiving and the effects of a possible change involving rural delivery. Fifty-six customers returned questionnaires, and the Postal Service responded.<sup>14</sup> In addition, representatives from the Postal Service were available at the Geuda Springs City Building for a community meeting on April 14, 2011, to answer questions and provide information to customers.<sup>15</sup> Thirty-eight customers attended.<sup>16</sup> Customers received formal notice of the Proposal and Final Determination through postings at the Geuda Springs and Oxford Post Offices. The Proposal was posted with an invitation for public comment at the Geuda Springs and Oxford Post Offices for 60 days beginning July 29, 2011, and ending September 29, 2011.<sup>17</sup>

Two customers returned comments in response to the “Invitation for Comments” after the Proposal was posted.<sup>18</sup> The Postal Service addressed

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<sup>12</sup> *Id.*

<sup>13</sup> Item 21, Cover Letter for Questionnaire.

<sup>14</sup> Item 22, Returned Questionnaires and Postal Service Response Letters; Item 23, Analysis of Questionnaires.

<sup>15</sup> Item 26, Community Meeting Letter.

<sup>16</sup> Item 24, Community Meeting Roster; Item 25, Community Meeting Analysis.

<sup>17</sup> Item 31, Instructions to Post Proposal; Item 32, Invitation for Comments; Item 33, Proposal.

<sup>18</sup> Item 34, Comment Form.

those concerns in letters to the customers.<sup>19</sup> The Final Determination was posted at the Geuda Springs and Oxford Post Offices beginning on October 31, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record as Item 49. The Final Determination has been posted continuously since October 31, 2011, and thus no removal date exists. In light of the Postmaster vacancy; minimal workload; low revenue; the variety of delivery and retail options (including the convenience of rural delivery and retail service); minimal projected population, residential, commercial, or business growth in the area; minimal impact upon the community; and the expected financial savings, the Postal Service issued the Final Determination. Regular and effective postal services will continue to be provided to the Geuda Springs community in a cost-effective manner upon implementation of the final determination.

### **Analysis**

Each of the issues raised by the Petitioners is addressed in the paragraphs which follow.

#### **Effect on Postal Services**

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Geuda Springs Post Office on postal services provided to Geuda Springs customers. The closing is premised upon providing regular and effective postal services to Geuda Springs customers.

Petitioners expresses specific concerns regarding, among others, security of the mail, service for senior citizens, ability to receive Accountable Mail and

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<sup>19</sup> Item 38, Proposal Comments and Postal Service Response Letters.

availability of postal services. These concerns, in addition to others, were also raised by other Geuda Springs customers in response to questionnaires, at the community meeting, and in comments to the proposal.<sup>20</sup> These concerns were considered by the Postal Service alongside other issues pertaining to the impact of closing the Geuda Springs Post Office upon the provision of postal services to Geuda Springs customers.<sup>21</sup>

Petitioners are concerned about the security of leaving medication in her mail box if she is gone for the day. The Postal Service explained that customers may place a lock on their mailboxes as long as the mailbox has a slot large enough to accommodate the customer's normal daily volume of mail.<sup>22</sup> If the customer chooses to lock the mailbox, the Postal Service will not accept a key for and will not open the customer's mailbox.<sup>23</sup> Customers may also utilize CBUs to securely receive their mail, which provide a locked box for letters and a larger locked compartment for parcels.<sup>24</sup> Further, as part of the discontinuance process, a questionnaire was sent to the U.S. Postal Inspection Service concerning mail theft and vandalism in the Geuda Springs Post Office area.<sup>25</sup> Postal Inspection Service records indicate that there has not been any report of mail theft or vandalism of mailboxes in the area.<sup>26</sup> The Postal Service is vigilant

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<sup>20</sup> Item 22, Returned Questionnaires and Postal Service Response Letters; Item 25, Community Meeting Analysis; Item 38, Proposal Comments and Postal Service Response Letters.

<sup>21</sup> FD at 2-7; Item 33, Proposal at 2-7; Item 41, Proposal (Revised) at 2-7.

<sup>22</sup> FD at 2-3; Item 23, Analysis of Questionnaires at 1; Item 25, Community Meeting Analysis at 2; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2.

<sup>23</sup> *Id.*

<sup>24</sup> FD at 2; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2.

<sup>25</sup> Item 14, Inspection Service Vandalism Reports.

<sup>26</sup> *Id.*

to mail theft and vandalism and will provide services to Geuda Springs Post Office customers to help ensure mail security.

Petitioners also raised concerns about delivery of Accountable mail and large packages. If a package is too large for the mail slot or the mail constitutes Accountable Mail, such as Certified Mail, the rural carrier will leave a Form 3849 informing the addressee that the carrier attempted to deliver a package that would not fit in the mailbox slot. The form indicates that the mail is available in the local post office to be retrieved by the customer or the addressee may attempt request redelivery.<sup>27</sup> The addressee is give the option to specify the date he or she would like the mail to be delivered, may specify an alternate location, such as a porch, may change the redelivery address to his or her workplace (if the work location is in the same town), or may designate a friend, neighbor or family member to accept the mail and the carrier will deliver the mail to that individual (if the individual is in the same town).<sup>28</sup> The original addressee may also receive the mail at the Oxford Post Office during business hours or the addressee's designee may receive the item at the Oxford Post Office, Monday through Saturday during business hours.<sup>29</sup> In sum, the Postal Service makes available several options for Geuda Springs Post Office customers that choose to utilize rural service and receive packages or Accountable Mail.

In addition, the loss of retail services and Post Office Boxes at Geuda Springs does not have a large impact on the quality of service provided by the Postal Service. As explained throughout the administrative record, rural carriers

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<sup>27</sup> See Form 3849

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

can perform many functions (at the same time that the carrier delivers the mail) that will avert the need to go to any Post Office, Oxford, Arkansas City or otherwise.<sup>30</sup>

Carrier service is especially beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or cluster box units.<sup>31</sup> Customers do not have to make a special trip to the Post Office for most services. Petitioners' concerns about the distance to travel to get stamps and the lack of a computer to order postal services are also accounted for through rural delivery. Stamps by Mail and Money Order Application forms are available from carriers for customer convenience, and stamps are also available at many stores and gas stations, online at [usps.com](https://usps.com), or by calling 1-800-STAMP-24.<sup>32</sup> Carriers may also sell stamps to customers while performing their route. Customers can also request special services, such as Certified, Registered, or Express Mail, Delivery Confirmation, Signature Confirmation, and COD from the carrier.<sup>33</sup> Further, most transactions do not require meeting the carrier at the mailbox.<sup>34</sup> Special provisions are made, on request, for hardship cases or special customer needs.<sup>35</sup>

Some petitioners requested that their free source of delivery transfer from the proposed CBUs to curbside mailboxes. As part of the discontinuance

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<sup>30</sup> FD at 2-7; Item 33, Proposal at 2-7; Item 41, Proposal (Revised) at 2-7.

<sup>31</sup> FD at 3-4; Item 23, Analysis of Questionnaires at 1-2; Item 25, Community Meeting Analysis at 2-3; Item 33, Proposal at 3-4; Item 41, Proposal (Revised) at 3-4.

<sup>32</sup> *Id.*

<sup>33</sup> FD at 3-5; Item 25, Community Meeting Analysis at 2-3; Item 33, Proposal at 3-5; Item 41, Proposal (Revised) at 3-5.

<sup>34</sup> FD at 3-5; Item 22, Item 23, Analysis of Questionnaires at 1-2; Item 33, Proposal at 3-5; Item 41, Proposal (Revised) at 3-5.

<sup>35</sup> *Id.*



implementation plan, the Postal Service is constructing CBUs outside the Geuda Springs City Building. These CBUs will replace P.O. Boxes at the Geuda Springs Post Office for those customers who are assigned P.O. Boxes as their current free source of delivery. Those customers are currently assigned P.O. Boxes because their physical address is not on a postal delivery route. The discontinuance of the Geuda Springs Post Office is not changing the current delivery routes, and so, current P.O. Boxes free source of delivery customers will not transition to rural curbside delivery. Ostensibly, these customers' delivery will not change, as their mail will continue to be delivered to a central location in Geuda Springs.

Petitioners also raised concerns about mail emanating from the Winfield Post Office, not the Oxford Post Office as had originally been anticipated. As of October 22, 2011, the rural route for Geuda Springs originates at the Winfield Post Office. Petitioners are correct that prior to October 22, 2011, carriers for Geuda Springs were based from the Oxford Post Office; however, as part of the Postal Service's Delivery Unit Optimization plan, the Postal Service determined that it was more economical and efficient to provide the same service from the Winfield Post Office. This change had no effect on customers, who continued to receive mail from the same method of delivery and obtain undeliverable mail at the same location, the Oxford Post Office, where rural carriers leave all undeliverable mail. Furthermore, the change of rural delivery for Geuda Springs as originating from the Oxford Post Office to the Winfield Post Office has no effect on the discontinuance of the Geuda Springs Post Office.

Petitioners also request that postal operations be transferred from the Geuda Springs Post Office to the Arkansas City Post Office, not the Oxford Post Office. In determining which office will provide rural delivery service, the Postal Service uses many factors, including mail volume, most efficient routes, and routes with the shortest distance. In this case, the Postal Service determined that the Oxford Post Office provided the most efficient delivery point for the rural route serving Geuda Springs. Thus, while it is true that for undeliverable mail, Geuda Springs customers will have to travel to the Oxford Post Office, for all other postal services, customers are free to patronize any Post Office, including the Arkansas City Post Office. Geuda Springs customers may also receive PO Box service at the Arkansas City Post Office, which would ultimately result all of the customer's mail, including otherwise undeliverable mail, being available at the Arkansas City Post Office.

Customers expressed a concern that the loss of the Geuda Springs Post Office would have a detrimental effect on the business community. There is no indication that the business community will be adversely affected. Businesses generally require regular and effective postal services and these will continue to be provided to the Geuda Springs business community.<sup>36</sup> The questionnaires completed by Geuda Springs customers indicate that, in general, the retirees, commuters, farmers and others who reside in Geuda Springs may travel

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<sup>36</sup> FD at 4-5; Item 33, Proposal at 4-5; Item 41, Proposal (Revised) at 4-5.

elsewhere for other supplies and services, but will continue to use local businesses if the Geuda Springs Post Office is consolidated.<sup>37</sup>

Upon the implementation of the Final Determination, delivery and retail services will continue to be provided by rural delivery emanating through the Oxford Post Office. In addition to rural delivery, which is the recommended alternate service, customers may also receive postal services, including P.O. Box service, at the Oxford Post Office, which is located 11 miles away. The window service hours of the Oxford Post Office are from 8:00 a.m. to 4:30 p.m., Monday through Friday and from 8:00 a.m. to 10:00 a.m. on Saturdays.<sup>38</sup> Thus, the Postal Service has properly concluded that all Geuda Springs customers will continue to receive regular and effective service via rural service.

### **Effect on Community**

The Postal Service is obligated to consider the effect of its decision to close the Geuda Springs Post Office upon the Geuda Springs community.<sup>39</sup> While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to discontinue a Post Office.

Geuda Springs is an incorporated town located in Sumner County. The community is administered politically by a mayor and council. Police protection is provided by the Sumner County Sheriff. Fire protection is provided by the Geuda

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<sup>37</sup> FD at 6; Item 16, Community Fact Sheet; Item 22, Returned Questionnaires and Postal Service Response Letters; Item 33, Proposal at 6; Item 41, Proposal (Revised) at 6.

<sup>38</sup> FD at 2; Item 18, Form 4920; Item 33, Proposal at 2; Item 41, Proposal (Revised) at 2.

<sup>39</sup> 39 U.S.C. § 404(d)(2)(A)(i).

Springs Volunteer Fire Department.<sup>40</sup> The questionnaires completed by Geuda Springs customers indicate that, the community is comprised of retirees, farmers, and those who commute to work in nearby communities and work in local businesses.<sup>41</sup> The town has four businesses.<sup>42</sup>

The Postal Service determined that its customers could continue to receive effective postal services elsewhere. Communities generally require regular and effective postal services and these will continue to be provided to the Geuda Springs community.<sup>43</sup> In addition, the Postal Service has concluded that non-postal services provided by the Geuda Springs Post Office can be provided by the Oxford Post Office.<sup>44</sup>

Petitioners assert that the Geuda Springs Post Office is the town's last social outlet. The closing of the Geuda Springs Post Office will not leave residents without a place to meet. Residents may continue to meet informally, socialize, and share information at the other businesses, churches and residences in the community-at-large. In addition, CBUs may provide a gathering place for customers when retrieving their mail.

Petitioners also are concerned that the lost of the Geuda Springs Post Office will result in a decrease in local property values. Property values, however, are a reflection of the vibrancy of the community. As discussed above, this is based on the strength of the Geuda Springs business community and the

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<sup>40</sup> FD at 6; Item 16, Community Fact Sheet; Item 33, Proposal at 6; Item 41, Proposal (Revised) at 6.

<sup>41</sup> See *generally* FD at 6; Item 16, Community Fact Sheet; Item 18, Form 4920; Item 33, Proposal at 6; Item 41, Proposal (Revised) at 6.

<sup>42</sup> FD at 6; Item 18, Form 4920; Item 33, Proposal at 6; Item 41, Proposal (Revised) at 6.

<sup>43</sup> FD at 6; Item 33, Proposal at 6; Item 41, Proposal (Revised) at 6.

<sup>44</sup> *Id.*

social and economic drive of the community. The Postal Service believes that Geuda Springs provides a solid community atmosphere, and the discontinuance of the Geuda Springs Post Office will not have a negative impact on the spirit of the community or its property values.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Geuda Springs Post Office on the community served by the Geuda Springs Post Office.

### **Economic Savings**

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural service would cost the Postal Service substantially less than maintaining the Geuda Springs Post Office and would still provide regular and effective service.<sup>45</sup> The estimated annual savings associated with discontinuing the Geuda Springs Post Office are \$27,440.<sup>46</sup> There is a one time cost of \$3000 incurred in relation to the construction of CBUs<sup>47</sup>. Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record and consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).<sup>48</sup>

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<sup>45</sup> FD at 8; Item 21, Cover Letter for Questionnaire; Item 33, Proposal at 7; Item 41, Proposal (Revised) at 7.

<sup>46</sup> FD at 7; Item 29, Proposal Checklist at 2; Item 33, Proposal at 8; Item 41, Proposal (Revised) at 8.

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

Petitioners note that the Postal Service has already reduced costs at the Geuda Springs Post Office by operating with a non-career OIC rather than a Postmaster. However, the economic savings calculation conducted as a part of a discontinuance study is forward-looking; the fact that the Postal Service may have paid less in salary and benefits over the past years does not mean that it could count on those savings annually in the future. If the Geuda Springs Post Office closes, one career slot will be eliminated. If the Post Office is not discontinued, that slot would ultimately have been filled with a career employee, and the salary and benefits to be paid would be as shown for a Postmaster. Thus, the Postmaster Salary and Fringe Benefits calculations in the Final Determination accurately reflect the future annual savings of discontinuing the Geuda Springs Post Office.

Petitioners assert that the Postal Service did not include the income generated by the Geuda Springs Post Office in its economic savings analysis. The Postal Service does not include income in its economic savings analysis because this income is derived from postage and service sales, which will transfer from the Geuda Springs Post Office to another postal facility. In sum, the overall income to the Postal Service is not expected to decline a significant amount as a result of the discontinuance. Petitioners also contend that income at the Geuda Springs Post Office should be greater than reported because when the current rural carrier sells stamps and other services to customers living in Geuda Springs, that income is attributed to the Winfield Post Office, not the Geuda Springs Post Office. While low revenue was one factor used by the

Postal Service in determining to close the Geuda Springs Post Office, numerous other factors played a role, including the current workload. Furthermore, the volume of sales for stamps and other services by the rural carrier in Geuda Springs would have a minimal impact on the overall income determination for the Geuda Springs Post Office

The Petitioners suggested strategies that might reduce costs at the Geuda Springs Post Office, specifically reducing the hours that the facility is open. The Postal Service has broad experience with similar options. However, in this case, it has determined that rural carrier service, coupled with service at the nearby Oxford Post Office, is a more cost-effective solution than maintaining the Geuda Springs Post Office and career position, even with reduced hours. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations.

Some Petitioners have suggested that the current lease costs for the Geuda Springs Post Office could be reduced. While this reduction would provide some economic savings, the overwhelming majority of the Postal Service's savings is a result of labor cost savings, not lease savings.

The Postal Service determined that rural route service is more cost-effective than maintaining the Geuda Springs postal facility and postmaster position.<sup>49</sup> The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting

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<sup>49</sup> FD at 8; Item 33, Proposal at 8; Item 41, Proposal (Revised) at 8.

from such a closing, consistent with its statutory obligations and Commission precedent.<sup>50</sup>

### **Effect on Postal Employees**

As documented in the record, the impact on postal employees is minimal. The Postmaster retired on November 26, 2008.<sup>51</sup> A non-career employee was installed as the temporary OIC. The non-career employee serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to an authorized position at a nearby facility.<sup>52</sup> The record shows that no other employee would be affected by this closing.<sup>53</sup> Therefore, in making the determination, the Postal Service considered the effect of the closing on the employee at the Geuda Springs Post Office, consistent with its statutory obligations.<sup>54</sup>

### **Conclusion**

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Geuda Springs Post Office on the provision of postal services and on the Geuda Springs community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

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<sup>50</sup> See 39 U.S.C. § 404(d)(2)(A)(iv).

<sup>51</sup> *Id.*

<sup>52</sup> FD at 7; Item 15, Post Office Fact Sheet at 1; Item 33, Proposal at 8; Item 41, Proposal (Revised) at 8.

<sup>53</sup> *Id.*

<sup>54</sup> See 39 U.S.C. § 404(d)(2)(A)(ii).



After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Geuda Springs customers.<sup>55</sup> The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accordance with the policies stated in 39 U.S.C. § 404(d)(2)(A).

Accordingly, the Postal Service respectfully requests that the determination to close the Geuda Springs Post Office be affirmed.

Respectfully submitted,

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<sup>55</sup> FD at 8.